

JACOB D. FLESHER – SBN 210565
JASON W. SCHAFF – SBN 244285
JEREMY J. SCHROEDER – SBN 223118
FLESHER SCHAFF & SCHROEDER, INC.
2202 Plaza Drive
Rocklin, CA 95765
Telephone: (916) 672-6558
Facsimile: (916) 672-6602

Attorneys for defendant,
PEARSON INCORPORATED dba RMS ROLLER GRINDER

IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE EASTERN DISTRICT OF CALIFORNIA

* * *

JORDAN PACINI,

Plaintiff,

vs.

RMS ROLLER GRINDER; and DOES 1-100,
inclusive,

Defendants.

CASE NO.

Madera Superior Court Complaint filed: 12/7/2021

Trial Date: not set

**DEFENDANT, PEARSON
INCORPORATED dba RMS ROLLER
GRINDER'S NOTICE OF REMOVAL OF
ACTION PURSUANT TO 28 U.S.C.
SECTION 1332.**

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

PLEASE TAKE NOTICE THAT defendant, PEARSON INCORPORATED dba RMS ROLLER GRINDER (erroneously sued as RMS ROLLER GRINDER), removes to this Court the state action described below.

1. On December 7, 2021, an action was commenced in the Superior Court of California in and for the County of Madera entitled *Jordan Pacini v. RMS Roller Grinder, et al.*, Case No. MCV086271. A true and correct copy of the Summons and Complaint filed in this action is attached as **Exhibit "A."**

2. RMS Roller Grinder was served with a copy of the Complaint on January 4, 2022. Therefore, this Notice of Removal is filed within 30 days after receipt by RMS Roller Grinder of a copy of the pleading setting forth the claim for relief upon which this action is based.

1 3. This action is a civil action of which this Court has original jurisdiction under 28
2 U.S.C. § 1332. The plaintiff is, based on information and belief, a resident of California, and
3 defendant's principal place of business is in South Dakota. Based on information and belief, the
4 amount in controversy exceeds \$75,000.

5 4. Venue is appropriate in this Court because the action was removed from Madera
6 County Superior Court. 28 U.S.C. § 1446(a).

7 5. There are no other named defendants. Therefore, there are no other defendants from
8 whom consent to remove is required.

9 6. A copy of the Notice to Adverse Party of Removal to Federal Court that will be filed
10 with the Superior Court of California, County of Madera, is attached as **Exhibit "B."**

11 7. Pearson Incorporated dba RMS Roller Grinder requests a jury trial.

12 Defendant prays that this action be removed to this Court.

13 DATED: February 3, 2022

FLESHER SCHAFF & SCHROEDER, INC.

14 */s/ Jacob D. Flesher*

15 By _____
16 JACOB D. FLESHER
17 JASON W. SCHAFF
18 JEREMY J. SCHROEDER
19 Attorneys for defendant,
20 PEARSON INCORPORATED dba RMS
21 ROLLER GRINDER
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